

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

REC'D TN  
REGULATORY AUTH.

'99 JUL 7 PM 3 06

In the matter of the Application of     )  
Discount Communications for a     )  
Certificate to Provide Competing     )  
Local Telecommunications Services     )

OFFICE OF THE  
EXECUTIVE SECRETARY  
**99-00489**

**APPLICATION FOR CERTIFICATE TO PROVIDE  
COMPETING LOCAL TELECOMMUNICATIONS SERVICES**

Pursuant to applicable Tennessee Statutes and the Rules and Regulations of the Tennessee Regulatory Authority and Section 253 of the Federal Telecommunications Act of 1996 ("Act"), Discount Communications ("Discount") respectfully requests that the Tennessee Regulatory Authority ("TRA") grant to Discount authority to provide competing local telecommunications services, including exchange access telecommunications services, within the State of Tennessee. Discount is willing and able to comply with all applicable rules and regulations in Tennessee pertaining to the provision of competing local telecommunications services.

*In support of its Application, Discount submits the following:*

**1. The full name and address of the Applicant is:**

Discount Communications  
3340 Poplar Ave Ste 301  
Memphis, TN 38111  
Telephone: (901) 843-6070  
Fax: (901) 327-2809

**Questions regarding this application should be directed to:**

Morris Harris Sr.  
Discount Communications  
3340 Poplar Ave Ste 301  
Memphis, TN 38111  
Telephone: (901) 843-6070  
Fax: (901) 327-2809

**Contact name and address at the Company is:**

Edward M. Hayes  
Discount Communications  
3340 Poplar Ave Ste 301  
Memphis, TN 38111  
Telephone: (901) 843-6070  
Fax: (901) 327-2809

**2. Repair and Maintenance Information.**

Discount understands the importance of effective customer service for local service consumers. Discount currently operates a repair center for its customers. They are able to call the company at its toll-free customer service number. In addition, customers may contact the company in writing at the headquarters address. The toll-free number is printed on the customers' monthly billing statements.

**3. Status of Discount in other states.**

None

**4. Financial, Managerial and Technical Qualifications.**

Discount Communications possesses the managerial, technical and financial ability to provide local communications service in the State of Tennessee as demonstrated in the attachments.

**5.A. Financial Qualifications**

In support of its financial qualifications, Discount Communications submitted to the TRA board in March 1998, its Financial Statement and Balance Sheets. Since our approval, our company has grown substantially.

Discount offers Cellular, Paging and Internet services as part of its complete telecommunications package.

Discount has a number of financing vehicles in place to ensure adequate liquidity in meeting its anticipated funding needs.

**5.B. Technical Qualifications**

Discount will satisfy the minimum standards established by the TRA. The Company will maintain the basic local standards, including quality of service and billing required of all CLECs and all rules and regulations of the TRA.

Discount is a solely owned and operated company with its home offices located in Memphis, Tennessee. The Company has a proving track record for providing high quality services and responsive customer service. Discount possesses all the necessary capabilities to operate as a CLEC in Tennessee.

Discount is one of the leading providers of Lifeline and Linkup in Tennessee. Our expertise in this area and all areas connected to providing quality local telephone service to subscribers in Tennessee.

Discount currently operates as a non-facility based CLEC in the ILEC, BellSouth, geographical operating area. (See attached document).

**6. Proposed Service Area**

The applicant propose to offer its services throughout the State of Tennessee in areas currently served by BellSouth.

Marketing efforts will be concentrated in all areas served by BellSouth.

**7. Types of Local Exchange Service to be Provided**

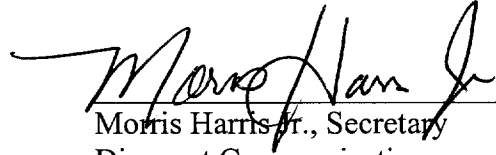
Trough the ILEC, Discount offers residential and commercial telephone services which includes PBX and DID services, Optional Calling Features, Directory Assistance, Directory Service, and Operator Services.

**8. Statement of Compliance**

Discount agrees to abide by all applicable states and all applicable Orders, rules and regulations entered and adopted by the Tennessee Regulatory Authority.

Respectfully submitted this 2<sup>nd</sup> day of **July 1999**.

Respectfully submitted,  
Discount Communications

A handwritten signature in black ink, appearing to read "Morris Harris Jr.", is written over a horizontal line.

Morris Harris Jr., Secretary  
Discount Communications  
3340 Poplar Ave Ste 301  
Memphis, TN 38111  
(901) 843-6070

Dated: 7/6/99

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BellSouth Interconnection Services    205 321-5030  
9th Floor    Fax 205 321-4351  
600 North 19th Street  
Birmingham, Alabama 35203

CLEC Interconnection Sales

June 29, 1999

To whom it may concern

This letter is to advise that as of June 29, 1999 Discount Communication is a non-facility based Competitive Local Exchange Carrier.

Sincerely

A handwritten signature in cursive script that reads "Regina Sellers".

Regina Sellers

Industrial Specialist

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## Verification

State of Tennessee

County of Shelby

Morris Harris Jr., being duly sworn, deposes and says: That he is the Secretary and Treasurer of Discount Communications, the applicant in the above proceeding, that he has read the foregoing application, and knows the content thereof, and that he is authorized by Discount Communications to verify that the contents of the applications are true.



Morris Harris Jr., Secretary  
Discount Communications  
3340 Poplar Ave Ste 301  
Memphis, TN 38111  
(901) 843-6070

Subscribed and sworn to before me this

4<sup>th</sup> Day of July 1999

Notary Public 

State of Tennessee

My commission expires: Nov 21, 2000

**Morris Harris Sr.**  
**Operations Manager**

Mr. Harris comes to Discount Communications with thirty-two years of experience in the communications field. Mr. Harris educational experience includes sixty hours of electrical engineering, accounting, and administration. He is the founder of Allied Electric Company of Memphis, the largest minority owned electrical contractor in the state of Tennessee. He has also served as President of Natcom LLC, formerly one of the largest resellers of cellular service in the Mid- South area.

As Operations Manager at Discount Communications Mr. Harris duties include assisting Mr. Hayes in the day to day operations of the company, such as structuring a state, regional and ultimately a nation wide communication organization. Mr. Harris oversees Discount Communications other goal of providing an opportunity for all Tennesseans to have telephone service regardless of economic status.

## **John M. Harrison**

John M. Harrison is Treasurer and Sales Manager. Mr. Harrison works with Discount Communications management team in the company's vision and strategic direction. He serves in an advisory capacity in all phases of Discount's operations.

Prior to joining with Discount Mr. Harrison was General Manager of Courtesy Pontiac. Later He was General Manager of Liberty Chrysler Plymouth Dodge and Chevrolet. Mr. Harrison was responsible for sales, service, business management and financial affairs of these locations. Before this Mr. Harrison was owner operator of Jackson Chrysler Plymouth Dodge.

Mr. Harrison has a background of 30 years in managing and operating automobile dealerships.

Mr. Harrison has a Bachelor's Degree in Business. He also has a Master's of Theology degree from Southwestern Baptist Seminary in Ft. Worth, Texas. He works very closely Southern Baptist and has served on the board of directors of Southwestern Baptist College as well as several State Baptist boards in Arkansas and Missouri.



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OFFICE OF THE  
EXECUTIVE SECRETARY

# **Intralata Toll Dialing Parity Plan**

99-00489

**Discount Communications  
Tennessee**

July 1, 1999

## **I. IntraLATA Environment**

Discount customers in Tennessee in the Discount LATA can currently dial seven digits to complete local exchange calls. The scheduled date for implementation of toll dialing parity should not change this dialing pattern. After upgrading switch technology and software configurations, seven-digit dialed numbers that are intraLATA toll calls should be prefixed with the area code before being transmitted to the carrier. This prefixing should allow carriers to receive a seven-digit dialed intraLATA toll number as a complete ten digit number.

## **II. Implementation Schedule**

Discount will offer dialing parity for intraLATA toll to all of its Tennessee customers, through BellSouth or from whichever company the end user selects, provided said company has the ability to bill the end user direct.

Discount will implement the full 2-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

Discount employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain the process to customers for making PIC changes for intralata toll calls. Business Office personnel will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

### *Existing Customers*

Currently, Discount is not the intraLATA toll provider for its existing customers in Discount local exchange area customers may presubscribe to any telecommunications carrier offering intraLATA toll service in their exchange. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers directly to Discount, as their local exchange service provider, through the local Business Office or indirectly through their selected carriers.

Customers will be assessed a cost-based PIC change. When customers request a change in their interLATA and intraLATA carriers during one contact with the Business Office and choose the same carrier for both jurisdictions, only one charge will be assessed. When customers request a change in their interLATA and intraLATA carriers during one contact with the Business Office and choose different carriers for each jurisdiction, two charges will be assessed.

For a waiver period of 30 days from implementation, customers will not be assessed an intraLATA PIC change charge for their initial intraLATA toll carrier choice. During the 30-day waiver period, a charge of one-half of the interLATA PIC change charge will be assessed when the intraLATA and interLATA carriers are changed to the same carrier during one contact with the Business Office. Only the interLATA charge will be assessed when the intraLATA and interLATA carriers are changed to different carriers during one contact with the Business Office during the waiver period.

A charge will be established for “slamming” or unauthorized PIC changes submitted by carriers or Discount for end-user customers. Discount will be subject to the rules related to slamming as indicated in Tennessee Regulatory Authority Rule I220-4-2-.56, Sections (2)-(6). [Section (1) defines the manner in which IXCs should confirm PIC change information prior to submitting the information to LECs, the communication of information

in the manner defined would not be applicable.]

### *New Installation Customers*

Customers who contact Discount requesting new telephone exchange service are currently being provided a list, upon request, of telecommunications carriers available to provide interLATA toll service. Upon implementation of intraLATA toll presubscription, the customer will be provided a second list of carriers that provide intraLATA toll service in their exchange. The list of intraLATA toll carriers will be presented in a competitively neutral manner. Customers who do not make a positive choice for an intraLATA toll carrier will be identified within Discount's system as a "no-PIC" and will not be automatically defaulted to a carrier. Customers identified as "no-PIC" within Discount's systems will be required to dial 10XXX to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

### **III. Customer Educational Notification**

Customers will receive information explaining their opportunity to select an intraLATA carrier a minimum of 30 days in advance of the offering of intraLATA toll dialing parity via a bill message. In addition, during the 30 days following implementation of intraLATA Dialing Parity, customers will receive a bill insert also explaining their opportunity to select an intraLATA carrier. Discount anticipates that promotional strategies by carriers will contribute to customer awareness of intraLATA toll dialing parity. Customer telephone directories will be updated as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier.

### **IV. Access to Operator Services and Directory Assistance**

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard has been established for access to Operator Services and Directory Assistance unique to the intraLATA carrier. For Operator Services, customers dial "0" to reach their local exchange

operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1411" in Discount's territory for accessing the local exchange Directory Assistance and customers dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

The local and interLATA Operator Services and Directory Assistance may be branded by the local and interLATA carriers, as appropriate, based on the dialing pattern of the end user. Since no unique intraLATA dialing pattern currently exists in the industry, Discount is not capable of identifying intraLATA calls to Discount's local or the DCC's interLATA operators or directory assistance representatives. As such, this procedure is considered in compliance with FCC Order No. 96-333, Rule 5 1-217(d).